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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ZANE E. GOODFIELD,

Plaintiff,

V.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:13-cv-01331-GMN-VCF

**UNOPPOSED MOTION FOR EXTENSION OF TIME**  
**(Third Request)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), requests that this Court extend the time to respond to Plaintiff's Motion for Reversal and/or Remand fourteen (14) days, until March 5, 2014. This is Defendant's third request for an extension of time. Plaintiff's counsel was contacted on February 18, 2014, and indicated that Plaintiff does not oppose the requested extension. Defendant's current deadline is February 19, 2014.

1 Defendant does not intend to unnecessarily delay this matter, but this request is necessary for  
 2 two reasons. In early February, the current agency counsel took this matter over from the previous  
 3 attorney, SSA OGC Assistant Regional Counsel Brenda Pullin upon her medical emergency, which  
 4 was more serious than expected. Upon reviewing the case, current agency counsel sought further  
 5 coordination with her client. Counsel anticipated a definitive response from her client by Monday,  
 6 February 18, 2014. However, the client is located in Falls Church, Virginia and its offices were  
 7 unexpectedly closed during the week of February 10 – 14, 2014, due to inclement weather. The  
 8 unexpected delay prohibits Defendant from responding to Plaintiff until March 5, 2014.

9 For this reason, the parties request that Defendant be granted an additional fourteen (14) days  
 10 to respond to Plaintiff's motion, up to and including March 5, 2014, with other deadlines extended  
 11 accordingly.

12 Respectfully submitted this 19th day of February 2014.

13 DANIEL G. BOGDEN  
 14 United States Attorney

15 /s/ Blaine T. Welsh  
 16 BLAINE T. WELSH  
 Assistant United States Attorney

17 OF COUNSEL:

18 DONNA L. CALVERT  
 Acting Regional Chief Counsel

19 ELIZABETH FIRER  
 20 Assistant Regional Counsel  
 21 Social Security Administration

22 **IT IS SO ORDERED:**

23   
 24 ~~UNITED STATES DISTRICT JUDGE~~  
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: 2-21-2014

**CERTIFICATE OF SERVICE**

I, Blaine T. Welsh, certify that the following individual were served with a copy of the  
**UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service  
identified below:

**Electronic Case Filing:**

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*Attorneys for Plaintiff*

Dated this 19th day of February 2014

/s/ Blaine T. Welsh  
BLAINE T. WELSH  
Assistant United States Attorney